

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

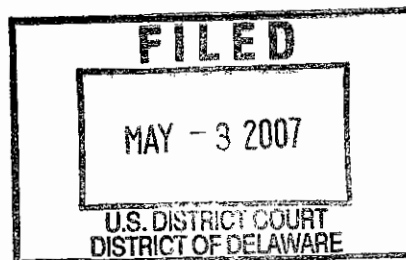
JIMMIE LEWIS

v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR OPPOSITION OF
DEFENDANTS JOHNSON - SAGERS -
GRAY'S AND MOFFETT'S MOTION
FOR EXTENSION OF TIME TO FILE
DISPOSITIVE MOTION



DATE: 4/24/07

Jimmie Lewis
506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

1. ON THE 28TH DAY OF JULY 2006, (DE. 72), THIS HONORABLE COURT SUBMITTED A SCHEDULING ORDER STATING THAT ANY REQUEST FOR EXTENSION OF TIME AS SET FORTH IN THE SAID SCHEDULING ORDER MUST BE MADE NO LATER THAN TWENTY ONE DAYS PRIOR TO THE EXPIRATION OF TIME.
- 2.) DEFENDANTS. JOHNSON - SAGERS - GRAY AND MOFFETT WERE NOTIFIED OF THE AMENDED SCHEDULING ORDER ON OR ABOUT THE 23RD OF FEB 2007, BUT HAVE FAILED TO SET FORTH THEIR MOTION FOR EXTENSION OF TIME, UNTIL NOW 30 DAYS THEREAFTER.
- 3.) THE PLAINTIFF HEREBY ASSERTS THAT HE WILL BE PREJUDICED IF THIS HONORABLE COURT GRANTS THE DEFENDANTS MOTION FOR EXTENSION OF TIME, DUE TO THE PLEADINGS OF THE COMPLAINT - INTERROGATORIES - DISCOVERY AND ADMISSIONS THAT HAVE BEEN SUBMITTED, UNDOUBTEDLY VARIFIES THAT THERE ARE NUMEROUS GENUINE TRIABLE DISPUTES OF MATERIAL FACTS FOR TRIAL.

4.) FURTHERMORE, DEFENDANTS JOHNSON-SAGERS - GRAY AND MOFFETT HAVE HAD ENOUGH TIME TO FILE AND OR PREPARE THEIR DISPOSITIVE MOTION. THE DEFENDANTS MOTION FOR EXTENSION OF TIME IS AN ATTEMPT TO UNDERMINE THIS HONORABLE COURT'S FEB 23, 2007 AND APRIL 9TH 2007 ORDERS, DUE TO WAITING TO NETWORK AND STRATEGIZE REGARDING THE DETAILS OF THE PLAINTIFF'S WRITTEN DEPOSITION; FOR WHICH WOULD ALSO PREJUDICE THE PLAINTIFF

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 24TH, DAY OF APRIL,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR OPPOSITION OF
DEFENDANTS JOHNSON - SAGERS - GRAY'S AND
MOFFETT'S MOTION FOR EXTENSION OF TIME
TO FILE DISPOSITIVE MOTION BY U.S. POSTAL
TO EACH OF THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
820 N. FRENCH ST 7TH FL
WILMINGTON, DELAWARE 19801

DATE: 4/24/07

Jimmie Lewis
SOI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

IM Timmie Lewis
SBI# 506622 UNIT 2412 18

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE
19801

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